

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
:   
MICHAEL AND MEGHAN GORDON :  
Debtor(s) : NO. 20-12102 AMC

**DEBTOR'S REQUEST FOR PRODUCTION DOCUMENTS ADDRESSED TO**  
**BANK OF AMERICA**

Debtor, Michael Gordon, by his undersigned attorney, hereby requests that Bank of America produce the following documents for Debtor's inspection and copy in accordance with Rule 7034 of the Federal Rules of Bankruptcy Procedure and Rule 34 of the Federal Rules of Civil Procedures.

**DEFINITIONS AND INSTRUCTIONS**

Unless negated by the context of the request, the following definitions are to be considered applicable to all requests contained herein:

(a) "Documents" is an all-inclusive term referring to any writing and/or recorded or graphic matter, however produced or reproduced. The term "documents" includes, without limitation, correspondence, memoranda, interoffice communications, minutes, reports, notes, schedules, analyses, drawings, diagrams, tables, graphs, charts, map surveys, books of account, ledgers, invoices, purchase orders, pleadings, questionnaires, contracts, bills, checks, drafts, diaries, logs, proposals, print-outs, recordings, telegrams, films, tax returns, and financial statements, and all other documents tangible or retrievable of any kind. "Documents" also include any preliminary notes and drafts of all the foregoing, in whatever form, for example, printed, typed, longhand, shorthand, on paper, paper tape, tabulating cards, ribbon blueprints, magnetic tape, microfilm, film, motion picture film, phonograph records or other form.

If any document is being withheld on the basis of privilege or work product doctrine, please describe the document by date, author, and addressee, state generally the contents of the document, and state the identity of all persons to whom copies of the allegedly privileged document were sent or received (in order that the propriety of the claim of privilege or work product can be determined).

- (a) The term "you" or "your" refers specifically to FIA Card Services and/or /Bank of America, its predecessors, assigns, officers, employees, attorneys and/or agents.
- (b) The term "Debtor" refers to the debtor in this matter.
- (c) The term "Proof of Claim" refers to the Proof of Claims filed by you in this case.
- (d) The term "Account" refers to the Debtor's account listed in your Proof of Claim.

These documents are to be produced for inspection and copying within thirty (30) days as set forth in Rule 7034.

**DOCUMENT REQUESTS**

1. A copy of Debtor's payment history and or all documents evidencing each payment you received from the Debtor between the date the account was opened through the present.
2. All correspondence you sent to the debtor regarding your attempt(s) to collect the debts listed in both proof of claims.
3. A copy of the original credit agreement for the FIA Card Services and/or /Bank of America account evidencing that the debtor obtained the account in his name as listed in your claim no. 3.

Respectfully Submitted,

Dated: October 16, 2020

/s/Kenneth E. West  
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